

BY ELECTRONIC TRANSMISSION

Hon. Magistrate Judge Sarah L. Cave
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

The parties' request at ECF No. 32 is GRANTED. By **February 19, 2024**, the parties shall file a joint status letter as to whether Respondent's production is complete or whether there are further issues for the Court's attention.

The Clerk of Court is respectfully directed to close ECF No. 32.

SO ORDERED. 1/19/2024


SARAH L. CAVE
United States Magistrate Judge

Re: *In re Application of Athene Holding Ltd for Judicial Assistance*
Pursuant to 28 U.S.C. § 1782, No. 23 Misc. 171 (JHR)(SLC)

Dear Magistrate Judge Cave:

The undersigned respectively represent Athene Holding Ltd (“Athene”) and respondent Ming Dang in the above captioned matter. This status letter is sent pursuant to Your Honor’s October 11, 2023 and December 18, 2023 Orders (ECF Nos. 27 and 31) after review and consent by both Athene and Mr. Dang.

On November 15, 2023, after completing review of Mr. Dang’s initial production, counsel for Athene transmitted by electronic mail a letter to counsel for Mr. Dang notifying Mr. Dang that Athene had identified documents from other parties’ productions that it believed should have been included in Mr. Dang’s production. Following Mr. Dang and his counsel’s execution of the confidentiality order in the Bermuda Action, by letter dated November 30, 2023, Athene identified those documents that it believed should have been produced. On December 12, 2023, Mr. Dang provided Athene with a chart addressing each of the documents identified by Athene, and made a supplemental production.

On December 15, 2023, counsel for Athene transmitted by electronic mail a letter to counsel for Mr. Dang indicating remaining and further deficiencies in Mr. Dang’s productions, which Mr. Dang disputes. Mr. Dang responded by letter transmitted by electronic mail on January 10, 2024 and provided an explanation for each purported deficiency.

Athene is reviewing Mr. Dang’s January 10, 2024 letter to determine what response from Athene is necessary.

To afford the parties time to continue to attempt to resolve any issues with Mr. Dang’s productions, Athene and Mr. Dang respectfully jointly request that this Court extend the status report deadline to **February 19, 2023**.

Respectfully submitted,

By: /s/ Scott H. Henney
Scott H. Henney

By: /s/ Paul R. Niehaus
Paul R. Niehaus